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UNITED STATES DISTRICT COURT
DISTRICT OF, NEVADA

HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
ENTERPRISE, LLC.,
Plaintiffs,

vs.

AMERICAN BORATE COMPANY a foreign
corporation; AMERICAN BORATE COMPANY
OF TEXAS a foreign corporation, STATE
ENGINEER, STATE OF NEVADA,
DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
WATER RESOURCES, A Nevada Political
Subdivision; RAMM Corporation, a Nevada
Corporation; UNITED STATES FISH AND
WILD SERVICE a division of the UNITED
STATES; NATIONAL PARK SERVICE, a
division of the UNITED STATES; and DOES I-
V, ROES VI-X,

Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS**

(FIRST REQUEST)

COMES NOW, Plaintiffs **HILLCREST INVESTMENTS, LTD. and AMERGOSA
ENTERPRISE, LLC** ("Plaintiffs") and Defendants, **AMERICAN BORATE COMPANY AND
AMERICAN BORATE COMPANY OF TEXAS** (hereafter "American Borate") by and
through their respective attorneys of record hereby stipulate and agree as follows:

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1 On June 28, 2022, American Borate filed a Renewed Motion for Sanctions (“Motion”).
2 *See* ECF No. 64. Plaintiff’s response to the Motion is due on July 12, 2022. The parties have agreed
3 to extend the response deadline to July 21, 2022 due to counsel’s workload and scheduling
4 conflicts. The parties request the extension until July 21, 2022. This is the parties’ first request.
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6 **LEONARD LAW PC**

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8 /s/ Debbie Leonard

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18 Attorney for American Borate
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**LAW OFFICES OF BYRON
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 /s/ Byron E. Thomas

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 Attorney for Plaintiffs

IT IS SO ORDERED.



 RICHARD F. BOULWARE, II
 UNITED STATES DISTRICT JUDGE

 DATED this 19th day of July, 2022.